

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

Christopher McClain, Individually and on §  
Behalf of Others Similarly Situated  
Plaintiff,

V. § CIVIL ACTION NO. 3:24-cv-3001-S

Manu-Force Corp. (Formerly Manu-Force,  
LLC), Jennifer J. Kearney, and John Daniel  
Kearney, Jr.,  
Defendants. § JURY DEMANDED

**JOINT STIPULATION OF DISMISSAL WITH PREJUDICE**

Plaintiff Chris McClain and Defendants Manu-Force Corp. (Formerly Manu-Force, LLC), Jennifer J. Kearney, and John Daniel Kearney, Jr. file this Joint Stipulation of Dismissal with Prejudice regarding Plaintiffs' claims against Defendants pursuant to FEDERAL RULE OF CIVIL PROCEDURE 41(a)(1)(A)(ii).

1. This case is not a class action and a receiver has not been appointed. Additionally, this action is not governed by any statute of the United States that requires an order of the court for dismissal of this case.

2. Plaintiffs hereby dismiss, with prejudice, all claims against Defendants. Plaintiff and Defendants will bear their own costs of suit.

3. As indicated by their attorneys' signatures below, all parties who have appeared in the action stipulate to the dismissal, with prejudice, of Plaintiffs' claims against Defendants.

Respectfully submitted,

/s/ Josef F. Buenker

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**ATTORNEY FOR DEFENDANTS**

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Joint Notice of Settlement has been electronically served on all counsel of record via Notice of Electronic Filing on a known Filing User through the CM/ECF system on February 28, 2025.

/s/ Douglas B. Welmaker  
Douglas B. Welmaker